

Message

From: Bouchard, Andrew [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=2039DC5C124E46F28DCE757FDD8A1C2D-BOUCHARD, ANDREW]
Sent: 3/15/2022 6:45:38 PM
To: Jason Renzaglia [Jason.Renzaglia@erg.com]
Subject: FW: CAA Section 114 - Chemical Manufactures - Questions from Analytical Lab

FYI. Can we post to the FAQ on the web?

Andrew Bouchard
Environmental Engineer
U.S. Environmental Protection Agency
OAR/OAQPS/SPPD/RCG
Phone: (919) 541-4036
Bouchard.Andrew@epa.gov

From: Shappley, Ned <Shappley.Ned@epa.gov>
Sent: Tuesday, March 15, 2022 2:12 PM
To: Bryan Tyler | Enthalpy Analytical <bryan.tyler@enthalpy.com>; Bouchard, Andrew <Bouchard.Andrew@epa.gov>; Dewees, Jason <Dewees.Jason@epa.gov>; Thorne Gregory <Thorne.Gregory@enthalpy.com>; Ashley Miller <amiller@montrose-env.com>
Cc: Garwood, Gerri <Garwood.Gerri@epa.gov>; Shine, Brenda <Shine.Brenda@epa.gov>
Subject: RE: CAA Section 114 - Chemical Manufactures - Questions from Analytical Lab

Hello Bryan,

Sorry for the delayed response.

For Method 325B, please provide TIC analysis for compounds with a theoretical mass >5 ng. For TO-15 analysis, please provide TIC analysis for compounds with a theoretical concentration of > 1 ug/m3.

Please let us know if you have any additional questions,

Ned Shappley

From: Bryan Tyler | Enthalpy Analytical <bryan.tyler@enthalpy.com>
Sent: Tuesday, 15 March, 2022 13:54
To: Bouchard, Andrew <Bouchard.Andrew@epa.gov>; Shappley, Ned <Shappley.Ned@epa.gov>; Dewees, Jason <Dewees.Jason@epa.gov>; Thorne Gregory <Thorne.Gregory@enthalpy.com>; Ashley Miller <amiller@montrose-env.com>
Subject: Re: CAA Section 114 - Chemical Manufactures - Questions from Analytical Lab

Hi Andrew,
Are you able to address my questions and concerns below...we have programs starting very soon and the ambiguity around the TIC analyses still exists.

Thank you,

Bryan Tyler
Senior Vice President



800-1 Capitola Dr., Durham, NC 27713
O: 919.850.4392 x12203 | M: 919.491.5145
bryan.tyler@enthalpy.com

To help protect the air we breathe, the water we drink, and the soil that feeds us.

*Please take a moment to provide customer feedback
Terms and Conditions & Enthalpy Sample Acceptance Policy*

On Wed, Feb 23, 2022 at 9:27 PM Bryan Tyler | Enthalpy Analytical <bryan.tyler@enthalpy.com> wrote:

Hi Andrew,

My laboratory, Enthalpy Analytical, has received multiple requests to support testers and industry who have received a CAA Section 114 Chemical Manufacturing letter. In reviewing the document(s) one question has arisen that we are hoping to receive guidance on. See statement below from section 3.2 which discussed EPA Method 325B and TO-15:

The analytical laboratory chosen for fugitive emission testing samples must also perform Tentatively Identify Compound (TIC) Analysis on each sample and report this data to the EPA. For additional information about a TIC analysis, please refer to: <https://www.epa.gov/sites/default/files/2015-06/documents/tics.pdf>.

We understand the TIC analysis requirement for both EPA Method 325B and TO-15, but need additional guidance:

1. Please specify the level of concern (detection limit) for the targeted analytes and TIC analysis. By requesting the TIC analysis, the instrument will have to operate in the scan mode which results in a .2-1ppb (in-air) detection limit...we assume that is the EPA's level of concern.
2. TICs are typically requested only where there are measurable detections of the target analytes, we request that the EPA only require TIC analysis when the target analytes are observed at or above the scan detection limit of .2-1ppb.
3. How many TICs do you want the lab to report? We ask that the EPA provide more guidance on the number or the TICs to call.

In summary we ask that the level of concern and number of TICs to report be better specified; and also that a certain threshold of target analyte be detected in the sample before a TIC analysis is performed.

Thank you for considering these questions/suggestions and I look forward to hearing back from you. I have copied my technical director, Thorne Gregory, on this email as well in case he has anything to add.

Regards,

Bryan Tyler
Senior Vice President



800-1 Capitola Dr., Durham, NC 27713
O: 919.850.4392 x12203 | M: 919.491.5145
bryan.tyler@enthalpy.com

To help protect the air we breathe, the water we drink, and the soil that feeds us.

Please take a moment to provide customer feedback

Terms and Conditions & Enthalpy Sample Acceptance Policy

CONFIDENTIALITY NOTICE: The contents of this email message and any attachments are intended solely for the addressee(s) and may contain confidential, proprietary and/or privileged information and may be legally protected from disclosure. If you are not the intended recipient of this message or their agent, or if this message has been addressed to you in error, please immediately alert the sender by reply email and then delete this message and any attachments and the reply from your system. If you are not the intended recipient, you are hereby notified that any disclosure, use, dissemination, copying, or storage of this message or its attachments is strictly prohibited.